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10 Attorneys for
FIRST SOLAR, INC.,
WILLOW SPRINGS SOLAR 3 LLC,
11 AND MOJAVE SOLAR, LLC¹

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

**PG&E CORPORATION, PACIFIC GAS AND
ELECTRIC COMPANY,**

Plaintiffs,

18

19 FEDERAL ENERGY REGULATORY COMMISSION,

Defendant.

Case No: 19cv00599-HSG

**JOINDER OF ADDITIONAL PPA
COUNTERPARTIES IN
MOTION TO WITHDRAW
REFERENCE**

²⁶ Pursuant to Rule 3-4 of the Local Rules for the United States District Court for the Northern District of California, in
²⁷ multiparty motions (such as the instant Joinder), the Court and parties-in-interest shall refer to the signature page
appended hereto for the full list of Movants party to the Joinder.

**TO THE COURT, TO PLAINTIFFS PG&E CORPORATION AND PACIFIC GAS
AND ELECTRIC COMPANY, AND TO DEFENDANT FEDERAL ENERGY
REGULATORY COMMISSION:**

4 Capital Dynamics, Inc., Enel Green Power North America, Inc., First Solar, Inc., FTP
5 Power LLC, KES Kingsburg, L.P., Mojave Solar LLC, Vantage Wind Energy LLC, and Willow
6 Springs Solar 3, LLC (collectively, the “**Additional PPA Counterparties**”) hereby join (the
7 “**Joiner**”) in the motion of NextEra Energy, Inc. and NextEra Energy Partners, L.P. (collectively,
8 “**NextEra**”) and the Memorandum of Points and Authorities filed in support thereof (collectively,
9 the “**NextEra Withdrawal Motion**”) to withdraw the reference of adversary proceeding, Case No.
10 19-03003-DM (the “**Adversary Proceeding**”) filed in the Bankruptcy Court for the Northern
11 District of California (the “**Bankruptcy Court**”).

12 Each of the Additional PPA Counterparties have been granted leave to intervene in the
13 Adversary Proceeding¹ and for the reasons set forth in the NextEra Withdrawal Motion, the
14 Additional PPA Counterparties respectfully request that the Court enter an order withdrawing the
15 reference of the Adversary Proceeding and granting such other and further relief as is just and
16 proper under the circumstances.

17 | DATED: February 26, 2019

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP

By: /s/ Amy S. Park

Amy S. Park
Attorneys for

FIRST SOLAR, INC.
WILLOW SPRINGS SOLAR 3, LLC AND
MOJAVE SOLAR LLC

²⁷ ¹ See *In re PG&E Corp. et al., PG&E Corp. et al. v. Fed. Energy Reg. Comm.*, Adv. No. 19-03003 (DM) (Bankr. N.D. Cal.), Adv. Docket Nos. 84, 89, 90, 91, 92, 93, & 94.

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